

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

SHASE HOWSE,	)	CASE NO.: 17-CV-1714
	)	
Plaintiff,	)	JUDGE:
	)	
v.	)	<b>DEFENDANT CITY OF</b>
	)	<b>CLEVELAND'S NOTICE OF</b>
THOMAS HODOUS, et al.,	)	<b>REMOVAL</b>
	)	
Defendants.	)	

Defendant City of Cleveland hereby give notice that they are removing the entire case of *Howse v. Thomas Hodus, et al.*, Cuyahoga County Common Pleas Court Case No. CV-17883403, to the United States District Court, Northern District of Ohio, Eastern Division. A copy of the relevant Petition and service of process is attached to and incorporated by reference into this Notice as öExhibit A.ö This case is removable from state court to federal court on the grounds that Plaintiff's Complaint is pursuant to öthe Fourth and Fourteenth Amendments to the United States Constitution and 42 U.S.C. § 1983.ö<sup>1</sup>

Respectfully Submitted,

BARBARA A. LANGHENRY (0038838)  
Director of Law

By: /s/ Stacey Pellom  
Stacey M. Pellom (0095292)  
Assistant Director of Law  
City of Cleveland, Department of Law 601  
Lakeside Avenue, Rm. 106  
Cleveland, OH 44114-1077  
Tel: 216-664-2800

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<sup>1</sup> See Exhibit A, Plaintiff's Complaint.

Fax: 216-664-2663  
Email: SPellom@city.cleveland.oh.us

*Attorney for Defendants*

**CERTIFICATE OF SERVICE**

A copy of the above **Defendant City of Cleveland's Notice of Removal** was served by regular U.S. mail, postage prepaid, upon Michael Nelson, attorney for Plaintiff, at 55 Public Square, Suite 1055, Cleveland, OH 44113 on this 16<sup>th</sup> day of August, 2017.

s/Stacey M. Pellom  
STACEY M. PELLOM